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Ms. Evelyn Rosborough
U.S. Environmental Protection Agency, Region 6
Permit Processing Team (6WQ-NP)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Ms. Rosborough:

Subject: Los Alamos National Laboratory, NPDES Permit No. NM0028355, Comments On Draft Permit Modification Issued December 19, 2014

Enclosed (Enclosure 1) are comments submitted by the U.S. Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) regarding the new draft National Pollutant Discharge Elimination System (NPDES) Permit Modification for the wastewater treatment facilities at the Los Alamos National Laboratory. Accordingly, please enter this letter and the enclosed comments into the administrative record for the subject NPDES Permit.

Please contact Marc Bailey of the Laboratory's Environmental Compliance Programs (ENV-CP) by telephone at (505) 665-8135 or Gene Turner at (505) 667-5794 of the DOE Los Alamos Field Office if you have questions regarding these enclosed comments or if additional information would be helpful.

Sincerely,

Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security LLC

Sincerely,

Gene E. Turner
Environmental Permitting Manager
Environmental Projects Office
Los Alamos Field Office
U.S. Department of Energy

AMD:GET:MTS:MAC/lm

Enclosures: (1) Comments on Draft Modification, NPDES Permit No. NM0028355

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ENCLOSURE 1

Comments on Draft Modification, NPDES Permit No. NM0028355

ENV-DO-15-0008

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ENCLOSURE 1

Comments on NPDES Permit Modification Dated December 19, 2014

Draft Permit, Page 1 of Part I, Outfall 001 Temperature Monitoring Requirements

The permit writer re-established a weekly monitoring requirement and effluent limitations at Outfall 001 for temperature as part of the draft modified permit. The proposed limitations are 20°C monthly average and 20°C daily maximum. The monitoring requirement is once per week by grab sample. Per discussions with the EPA permit writer on January 8, 2015, EPA's intent was to re-establish the temperature effluent limitations as they were in the previous permit. The monitoring and reporting requirements and temperature limitations would be interim requirements until the 6T3 temperature limitation becomes effective.

The previous NPDES permit effluent limitations were 24°C monthly average and 24°C daily maximum. Effluent monitoring was required once per week by grab sample. Based on this information, the permittees request the proposed limitations of 20°C be change to 24°C for the monthly average and daily maximum, per the previous permit.

Additionally, the 6T3 temperature requirement effective one day before the permit expiration date does not appear to include the 24°C (75°F) maximum temperature requirement contained in NMAC 20.6.4.806 H. (2).

20.6.4.806 NMAC, H. Aquatic Life, states in part:

(2) *Coldwater: dissolved oxygen 6.0 mg/L or more, 6T3 temperature 20°C (68°F), maximum temperature 24°C (75°F) [emphasis added] and pH within the range of 6.6 to 8.8. Where a single segment-specific temperature criterion is indicated in 20.6.4.101-899 NMAC, it is the maximum temperature and no 6T3 temperature applies.*

Fact Sheet, Page 4 of 7

EPA's response to the permittees request for clarification and a compliance schedule for storm water and roof drain water monitoring at Outfall 04A022 includes:

Because both pH and TSS limitations were retained from the previous permit and discharges of storm/roof drain are infrequent, the permittees should be able to use existing on-site technologies to control both pH and TSS.

The previous permit included cooling tower blowdown being discharged to Outfall 03A022 and did not specifically list storm water and roof drain water as sources of discharge to the outfall. Per the new permit, cooling tower blowdown is not allowed at this outfall (new designation is 04A022). The emergency cooling system is expected to discharge rarely, so it is anticipated that storm water and roof drain water will now be the majority of discharges at this outfall. The Facility has stated that it is currently not possible to isolate the roof drains from the discharge pipe. As previously stated, the pH of natural rainwater in this area is often less than 6.0 s.u.

